

Tisa, Kimberly

From: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>
Sent: Friday, September 15, 2017 7:30 AM
To: Tisa, Kimberly
Subject: FW: BASF- former Ciba Geigy facility, Cranston

Sorry, I forgot to put you in the CC line. This supplemental GW proposal is on the Lot where the PCBs in soil are to be removed and where residual PCBs was detected in groundwater.

From: Crawford, Jeffrey (DEM)
Sent: Friday, September 15, 2017 7:28 AM
To: 'nbrolowski@cecinc.com' <nbrolowski@cecinc.com>
Cc: Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>; Roy, Craig (DEM) <craig.roy@dem.ri.gov>; battaglia.frank@epa.gov; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>
Subject: BASF- former Ciba Geigy facility, Cranston

Navpreet-

The Department has been reviewing the Supplemental Pilot Study Work Plan for Ciba Geigy RCRA Closure Project-Insitu Subsurface Ozone Injections by CEC for the former Ciba Geigy facility in Cranston, Rhode Island. A question has been raised concerning the proposed injection locations in the plan and the locations of the groundwater monitoring wells for post injection monitoring. It appears from the figures provided that there are not many monitoring wells, if any, located downgradient of the proposed injection wells. CEC makes the point within the work plan that site COCs may desorb from the soil and increase COC groundwater concentrations during treatment with ozone. The Department is concerned that the increased COC concentrations in groundwater could eventually impact the Pawtuxet River and that sufficient downgradient monitoring wells are not present to monitor for both the impacts to groundwater and the river. Additionally, it appears that there is only one round of post injection groundwater monitoring proposed.

Please clarify and identify the locations of the monitoring wells to be sampled and whether or not additional downgradient monitoring wells are proposed for installation. Also, what is the plan for groundwater monitoring post pilot study?

Jeff Crawford

